

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED
NOV 08 2004

GEORGE S. MAY
INTERNATIONAL COMPANY,

FILED

Plaintiff,

NOV 5 2004
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Case Number 04-C-6018

-vs-

XCENTRIC VENTURES, LLC,
RIP-OFF REPORT.COM
BADBUSINESSBUREAU.COM,
ED MAGEDSON, VARIOUS
JOHN DOES, JANE DOES AND
ABC COMPANIES,

Defendants.

Judge Norgle

SECOND DECLARATION OF RACHEL M. KINDSTRAND

I, Rachel M. Kindstrand, have personal knowledge of the facts alleged herein, am competent to testify, and if called as a witness, would testify as follows:

1. I am an attorney licensed and in good standing with the State Bar of Illinois, and I am admitted to practice before the General Bar of the United States District Court for the Northern District of Illinois, Eastern Division.

2. I have entered an appearance as counsel for Plaintiff George S. May International Company in the above-captioned case.

3. I make this declaration in support of the Exhibits which are attached to this Declaration. This Declaration is made in support of GSMIC's Reply Memorandum of Law In Support of Its Motion for a Preliminary Injunction.

4. On November 5, 2004, I personally went to Defendants' website, www.ripoffreport.com. I inputted George S. May into the search request dialogue box. A

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number of entries for reports involving Plaintiff were generated. I viewed and printed a report entitled "George S. May ripoff 'The Prostitute of the Consulting Business...'" located at www.ripoffreport.com/reports/ripoff95354.htm. This same report included a rebuttal entitled "Chet is right! George S. May could take care of their problems like Fashion Rock did." This entire report is attached as Exhibit A to this Second Declaration.

5. On November 5, 2004, I ran a search in the search engine www.hotbot.com, using the terms George S. May Company. A report on Ripoffreport.com about GSMIC is listed as the seventh result of this search. There were 1,762,088 results for this search. The search results are attached as Exhibit B to this Second Declaration.

6. On November 5, 2004, I ran a search in the search engine www.yahoo.com, using the terms George S. May Company. A report on Ripoffreport.com about GSMIC is listed as the eighth result of this search. There were about 8,570,000 results for this search. The search results are attached as Exhibit C to this Second Declaration.

7. On November 5, 2004, I ran a search in the search engine www.lycos.com, using the terms George S. May Company. A report on Ripoffreport.com about GSMIC is listed as the seventh result of this search. There were 1,761,529 results for this search. The search results are attached as Exhibit D to this Second Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 5, 2004
Chicago, Illinois.


Rachel M. Kindstrand

*See Case
File For
Exhibits*